

EXHIBIT F

FILED UNDER SEAL

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

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12 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
13
14 VIDEOTAPED DEPOSITION OF ALEXANDER (SASHA) ZBROZEK
15 VOLUME II
16 WEDNESDAY, SEPTEMBER 6, 2017

20 Reported by:
21 Anrae Wimberley
22 CSR No. 7778
23 Job No. 2693569
24
25 Pages 178 - 317

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		Page 229
1	MR. BAKER: I want to mark the transcript highly	15:03:46
2	confidential.	15:03:48
3	MR. GONZALEZ: We would object to that, but we'll	15:03:53
4	deal with that later.	15:03:56
5	BY MR. GONZALEZ:	15:03:56
6	Q. Then in that same e-mail, after you say it's	15:03:59
7	"low value," in the very next paragraph, you say,	15:04:03
8	"It's not particularly surprising that he might check	15:04:08
9	things out once in the misguided dream of maybe making	15:04:13
10	individual contribution" --	15:04:15
11	Do you see that?	15:04:16
12	A. I do see that.	15:04:17
13	Q. And the "he" you're talking about is	15:04:20
14	Mr. Levandowski; is that correct?	15:04:21
15	A. That is correct.	15:04:22
16	Q. -- "or maybe taking a look at the progress of	15:04:26
17	a widget."	15:04:26
18	Do you see that?	15:04:27
19	A. I do see that.	15:04:28
20	Q. And you expressed that opinion to the lawyer,	15:04:30
21	understanding that the lawyer was looking into	15:04:33
22	Mr. Levandowski's conduct; correct?	15:04:35
23	MR. BAKER: Objection to form.	15:04:36
24	THE WITNESS: What the lawyer was hoping to get, I	15:04:39
25	don't know.	15:04:39

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		Page 267
1	Do you see that, underneath, with a whole	16:22:53
2	bunch of bullet points?	16:22:55
3	A. I do.	16:22:55
4	Q. Did you write those?	16:22:57
5	A. I believe so.	16:22:58
6	Q. Were any of those ultimately what Google did	16:23:02
7	with respect to the SVN materials?	16:23:05
8	MR. BAKER: Objection to form.	16:23:11
9	THE WITNESS: Man, the formatting took a hit on	16:23:14
10	this. [REDACTED]	
[REDACTED]		16:23:22
12	BY MR. CHATTERJEE:	16:23:22
13	Q. [REDACTED] ?	16:23:27
14	A. [REDACTED]	
[REDACTED]	.	16:23:44
16	Q. [REDACTED]	
[REDACTED]		16:23:51
18	Do you see that?	16:23:53
19	A. Yes.	16:23:53
20	Q. [REDACTED]	
[REDACTED]		
[REDACTED]		16:24:01
23	Do you see that?	16:24:02
24	A. Yes, I see that.	16:24:03
25	Q. What did you mean when you wrote that?	16:24:06

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		Page 270
1	MR. BAKER: Objection to form.	16:26:34
2	THE WITNESS: I think it was probably more clear	16:26:37
3	with the coloring, but I don't remember for sure.	16:26:41
4	BY MR. CHATTERJEE:	16:26:41
5	Q. After you wrote this e-mail, do you know what	16:26:44
6	happened with respect to decisions about how to deal	16:26:46
7	with [REDACTED]?	16:26:50
8	A. I remember generally some things that	16:26:53
9	happened, but I don't remember exactly the order or	16:26:57
10	whether or not my memory is complete.	16:27:00
11	Q. So generally what happened?	16:27:03
12	A. I think in the very short term -- and, again,	16:27:06
13	this is a little fuzzy, it's been a while.	16:27:10
14	I think in the short term, we managed to get	16:27:12
15	[REDACTED] And then we got -- then we got	16:27:19
16	approval to have [REDACTED]	
[REDACTED]		
25	Q. Do you know approximately how long it took	16:27:55

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1 from the time you sent this e-mail to the time that 16:28:00
2 [REDACTED] 16:28:03
3 A. I don't remember. 16:28:04
4 Q. One month, two months? Any sense? 16:28:08
5 A. I just don't remember. 16:28:09
6 Q. If you go to the "Background" section, 16:28:15
7 there's a sentence here -- it's the second from last 16:28:18
8 in that section. [REDACTED]
9 [REDACTED] 16:28:25
10 Do you see that? 16:28:25
11 A. I do.
12 Q. Who told you to use [REDACTED] 16:28:29
13 A. I don't remember. 16:28:30
14 Q. Do you know why it was a nonstarter? 16:28:35
15 A. Yes. 16:28:35
16 Q. Why was it a nonstarter? 16:28:38
17 A. [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED] 16:28:52
21 Q. Do you use the TortoiseSVN software tool? 16:28:59
22 A. Yes, I do. 16:29:00
23 Q. And you use that to access the Subversion 16:29:02
24 server for Project Chauffeur and Waymo today? 16:29:07
25 A. Yes, I do. 16:29:09

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		Page 282
1	MR. CHATTERJEE: What's the next exhibit number?	16:41:03
2	THE REPORTER: 2225.	16:41:05
3	MR. CHATTERJEE: This is Exhibit 2225.	16:41:07
4	(Defendants' Exhibit 2225 was marked.)	16:41:32
5	BY MR. CHATTERJEE:	16:41:32
6	Q. Mr. Zbrozek, what I've handed you is Exhibit	16:41:37
7	2225. Just take a quick look at it, and let me know	16:41:41
8	when you're done.	16:41:42
9	(Witness reviews document.)	16:42:05
10	A. Okay.	16:42:06
11	Q. Do you recognize this document?	16:42:07
12	A. I think so.	16:42:08
13	Q. What is it?	16:42:09
14	A. [REDACTED]	
[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	16:42:24
18	A. That's the domain for it.	16:42:26
19	Q. [REDACTED]	
[REDACTED]	[REDACTED]	16:42:30
21	A. It does not refer to the hosting service.	16:42:35
22	Q. And if you compare it to Exhibit 2216, this	16:42:40
23	e-mail on Exhibit 2225 was sent six days after you	16:42:46
24	sent that electrical [REDACTED]	16:42:50
25	A. That appears to be the case.	16:42:52